

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES

1. Subjects of Fact Discovery:

2. Subjects of Expert Discovery:

3. Can fact and expert discovery occur at the same time? Why/why not?

4. Pre-trial Deadlines:

a. Date for Initial Disclosures:

- b.** Date for joinder/amendment:
- c.** Date for close of fact discovery:
- d.** Date for close of expert discovery, if bifurcated:

5. Do the parties want a Rule 502 non-waiver order – Yes or No?

6. Are there any ESI issues to address? If yes, please explain:

7. Protective Order – Yes or No? If yes, please explain:

Respectfully submitted,
